One Penn Plaza **Suite 5315**

New York, New York 10119

Telephone (212) 736-5300 • Fax (212) 971-9840

www.blockotoole.com

Partners

Jeffrey A. Block Daniel P. O'Toole Stephen J. Murphy S. Joseph Donahue David L. Scher

September 14, 2015

Associates Michael J. Hurwitz Thomas Brennan Christina Mark* Romina Tominovic Brigit Zahler

Senior Counsel

Frederick C. Aranki Scott Occhiogrosso

The Honorable John Gleeson United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

The Honorable Steven M. Gold

United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Of Counsel

Daniel Seiden**

George A. Freitag Javier A. Solano Ravi Sattiraju

Case No. 1:13-cv-04477-JG-SMG; Gill v. Bahlmann et al. RE:

Dear Judge Gleeson and Judge Gold:

We write this letter as a joint status report, as required by Your Honor's July 30, 2015 directive. As you know, Mr. Gill's Chapter 7 bankruptcy proceeding was re-opened on July 18, 2015 following a motion by the prior Trustee Richard J. McCord, Esq. Mr. McCord continues as the appointed Trustee. The Trustee has not yet retained any lawyer to continue with the prosecution of Mr. Gill's personal injury claims, which are pending under the subject docket number.

Pursuant to our conversation with Mr. McCord's office today, there will be no further changes on the status of the bankruptcy proceedings until Mr. Gill's personal injury action is resolved.

We respectfully request another month, October 14, 2015 to provide Your Honors with another status report. We again, appreciate Your Honors' patience as we further work together with all parties for a resolution.

^{*}Senior Associate, Appellate and Motion Practice

^{**}Bar results pending

One Penn Plaza Suite 5315 New York, New York 10119

Respectfully submitted,

David L. Scher, Esq. Counsel for Plaintiff

Cc: Kenneth Arthur Rigby, Esq.
Law Offices of Kenneth Arthur Rigby, PLLC
15 Maiden Lane, Suite 1500
New York, NY 10038